

South Dakota Stockgrowers Association
426 St. Joseph St.
Rapid City, S.D., 57701

Air and Radiation Docket and Information Center
Environmental Protection Agency
Mailcode: 2822T
1200 Pennsylvania Ave., NW.
Washington, DC 20460.

November 26, 2008

Re: Docket ID No. EPA-HQ-OAR-2008-0318

To Whom It May Concern:

Background:

The South Dakota Stockgrowers Association (SDSGA) is an organization of about 1,500 cattle producers committed to representing the independent cattle industry's needs in regard to animal health, trade, marketing and land use issues.

SDSGA appreciates the opportunity to provide meaningful input regarding Docket number EPA-HQ-OAR-2008-0318.

Comments:

The SDSGA submits these comments on the Environmental Protection Agency's (EPA) Advance Notice of Proposed Rulemaking (ANPR) for regulating greenhouse gases (GHG) under the Clean Air Act (CAA).

We strongly oppose the document submitted for comment that outlines hypothetical scenarios such as attempting to tax gases produced by livestock. The SDSGA finds these concepts to be far removed from common sense. Clearly this would put many, many cattle producers out of business. Cattle producers who remained would likely be very large corporate operations, the kind that would likely create more environmental damage than a small independent producer. Your taxes could easily create the very situation you are trying to prevent: huge, concentrated mega-operations that hire attorneys to help them jump through legal hoops as they wreak havoc on the environment.

We estimate that, were these suggestions implemented, the price of meat for U.S. consumers would skyrocket, and we would no longer be the safest beef producers in the world; independent producers would be a thing of the past. At best, only a few factory farms would remain.

We remind you that the cleanest, purest and most beautiful landscape, air and water can only be found where agriculture flourishes. If agriculturalists are taxed out of business, the environment will surely suffer. Farmers and ranchers care for their land and water in a careful and conscientious manner.

We strongly urge you to retract your proposal and take a fresh approach to agriculture and the environment. Don't lump all of agriculture into one category. Surely there are situations where the environment is being harmed but don't "throw the baby out with the bathwater" as they say.

Consider each unique situation to determine whether there is environmental damage being done.
We know that in most cases you will find that the environment is being protected and cared for.

Sincerely,

Larry Nelson